

REMARKS

Upon entry of the present amendment, claims 1 and 3-11 will remain pending in the application. Claims 1 and 7 will be amended, and claim 2 will be canceled. Entry of the present amendment, reconsideration of the rejection and allowance of the pending application in view of the following remarks are respectfully requested.

As an initial matter, Applicants would like to thank the Examiner for acknowledging receipt of the certified copy of the foreign priority document.

Applicants also thank the Examiner for indicating that he has considered all of the documents submitted in the Information Disclosure Statement filed on January 21, 2005.

In the Final Office Action, the Examiner has rejected claims 1-7 and 9-11 under 35 U.S.C. § 103(a) as being unpatentable over Humpleman et al. (U.S. Patent No. 6,182,094) in view of Sato et al. (U.S. Patent No. 6,523,696). Applicants respectfully traverse the rejection for at least the following reasons.

In the specification, Applicants disclose a home appliance control system which includes, inter alia, a plurality of home appliances installed in a building, a computing device that sets private Internet protocol (IP) addresses and port numbers of the home appliances, and a plurality of communication modules. The computing device has a public IP address that enables access from the external Internet network. Each of the communication modules correspond to one of the home appliances and store the private IP address and port number of the corresponding home appliance. See, for example, Figure 1, and page 6, lines 12-21, and page 10, lines 1-8 of the specification.

Humpleman is directed to a home network 100, which includes multiple home devices. In one embodiment, a dynamic host configuration protocol (DHCP) server 106 performs the functions of a configuration manager for the home network. See col. 10, lines 64-67.

Applicants respectfully submit that Humpleman's DHCP server 106 does not have a public IP address that enables access from an external Internet network, as recited in Applicants' independent claims 1 and 7. In col. 20, lines 32-51, Humpleman discloses that the home network may be connected to the Internet. However, Humpleman discloses that an Internet proxy 1104, and not the DHCP server 106, provides an interface between the home network 1100 and the Internet 1102. See Figure 14, and col. 20, lines 42-47. Thus, Applicants submit that, contrary to the Examiner's assertion, Humpleman does not disclose that the DHCP server 106 is provided with a public IP address. That is, Applicants submit that Humpleman fails to disclose or suggest that the computing device has a public IP address to enable access from an external Internet network, as specified by Applicants' claimed invention.

Furthermore, in the Office Action, the Examiner acknowledged that Humpleman's DHCP server does not set port numbers of the home devices, and the home devices do not store port numbers. However, the Examiner asserted that these features are taught by Saito. Applicants respectfully disagree.

Saito discloses a home network which includes a PC 210, and an air conditioner 213 and a microwave oven 214 which connect to the PC 210 via a home automation network 212. See Figure 7. Saito discloses that the PC 210 is a proxy for the air conditioner 213 and the microwave oven 214. See col. 24, lines 41-44. Saito also

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discloses that a port number (such as "15000" or "15001") of the PC 210 is assigned to the air conditioner 213 and microwave oven 214, and that as a result, an external terminal interprets that the air conditioner 213 and the microwave oven 214 services are existing on the PC 210. See Figures 16C and 16D and col. 24, lines 41-54.

Applicants respectfully submit that Saito does not disclose that the air conditioner 213 or the microwave oven 214 correspond to a communication module which stores a private IP address and a port number, as taught by Applicants in their disclosure. Rather, Applicants submit that Saito discloses that an external terminal makes access to a port number, such as, for example, "15000", when it is desired to make access to the microwave oven 214 service, the PC 210 interprets this as a service request directed to the microwave oven 214, and then, the PC 210 translates the IP control command into a Local Operating Network (LON) control command and sends it to the microwave oven 214. See col. 24, lines 54-67.

Applicants submit that Saito fails to disclose that which is lacking in Humpleman; namely, that the computing device has a public IP address that allows access from an external Internet network.

Thus, Applicants respectfully submit that the combination of Humpleman and Saito does not disclose or suggest a home appliance control system that includes a computing device that sets private IP addresses and port numbers of a plurality of home appliances installed in a building, and a plurality of communication modules which each correspond to one of the home appliances, where the computing device has a public IP address, and each communication module stores a private IP address and port number of its corresponding home appliance, as recited in Applicants' independent

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claim 1. For at least these reasons, Applicants respectfully submit that the 35 U.S.C. § 103(a) rejection is improper, and respectfully request withdrawal of this ground of rejection.

Applicants respectfully submit that the combination of Humpleman and Saito also fails to disclose or suggest a method for controlling home appliances which includes installing a plurality of communication modules in the home appliances, which each store a set private IP address and port number of a corresponding home appliance, and setting the private IP addresses and port numbers with a computing device that has a public IP address, as recited in Applicants' independent claim 7.

Dependent claims 3-6 and 9-11 are also submitted to be in condition for allowance for at least the reasons set forth above with respect to independent claims 1 and 7.

In the Office Action, the Examiner rejected claim 8 as being unpatentable under 35 U.S.C. § 103(a) over Humpleman and Saito, and further in view of Abrams et al. (U.S. Patent No. 6,587,739). Applicants respectfully traverse the rejection for at least the following reasons.

Applicants respectfully submit that Abrams, which is directed to an appliance communication and control system, fails to overcome the above-noted deficiencies of Humpleman and Saito. That is, Applicants submit that the combination of Humpleman, Saito and Abrams fails to disclose or suggest a method for controlling home appliances which includes installing a plurality of communication modules in the home appliances, which each store a set private IP address and port number of a corresponding home

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appliance, and setting the private IP addresses and port numbers with a computing device that has a public IP address, as recited in Applicants' independent claim 7.

Thus, dependent claim 8 is respectfully submitted to be in condition for allowance for at least the reasons set forth above with respect to independent claim 7.

Based on the above, it is respectfully submitted that this application is now in condition for allowance, and a Notice of Allowance is respectfully requested.

SUMMARY AND CONCLUSION

Applicants recognize that the current status of this application is after-Final. However, Applicants submit that entry of the present amendment is proper in the current circumstances, as the amendment does not raise any new issues requiring further search and/or consideration.

Entry and consideration of the present Response, reconsideration of the outstanding Final Office Action, and allowance of the present application and all of the claims therein are respectfully requested and now believed to be appropriate. Applicants have made a sincere effort to place the present invention in condition for allowance and believe that they have now done so.

Should an extension of time be necessary to maintain the pendency of this application, including any extensions of time required to place the application in condition for allowance by an Examiner's Amendment, the Commissioner is hereby authorized to charge any additional fee to Deposit Account No. 19-0089.

Should the Examiner have any questions or comments regarding this Response, or the present application, the Examiner is invited to contact the undersigned at the below-listed telephone number.

Respectfully submitted,  
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